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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

EMPIRE FIRE AND MARINE INS. CO.,	)	Case No.: 2:21-cv-00289-JCM-EJY
	)	
Plaintiff,	)	STIPULATED TO EXTEND DISCOVERY
	)	
vs.	)	FIRST REQUEST
	)	
NICOLE ELYSE BROOKS, et al.	)	
	)	
Defendants.	)	

Plaintiff Empire Fire and Marine Ins. Co. ("Plaintiff") and Defendants Jose Rodriguez, Jacob Ramirez and Jose Luis Tello-Robles (collectively "Defendants"), by and through counsel, stipulate and agree as follows:

WHEREAS, this matter is an insurance coverage dispute arising from a two (2) vehicle auto accident which involved a vehicle Defendant Nicole Brooks ("Brooks")<sup>1</sup> rented from Malco Enterprises of NV, dba Budget Rent A Car of Las Vegas ("Budget");

WHEREAS, Brooks purchased excess liability insurance in connection with the rental;

WHEREAS, the Defendants have commenced with an underlying suit in which they seek damages based on the contention that Brooks was at fault for the accident;

WHEREAS, Plaintiff alleges the accident was staged and commenced with the instant action;

<sup>1</sup> As Brooks has not appeared, this Court has entered her default. Dkt. No. 17..

1 WHEREAS, Plaintiff, who has identified several witnesses that may possess relevant  
2 information, has completed several depositions in the case and has diligently sought to depose  
3 various additional third party witnesses via subpoena in advance of the February 11, 2022 deadline  
4 to complete discovery [Dkt. No. 10];

5 WHEREAS, one third party witness (Daisy Diaz) has requested that her deposition proceed  
6 on February 16, 2022;

7 WHEREAS, another third party witness (Toybe Bennett) failed to show for his deposition  
8 while Plaintiff has been unsuccessful in locating two additional third party witnesses - Kim Hodges  
9 and Ghetta Elliott.

10 WHEREAS, Plaintiff would like additional time to complete the deposition of D. Diaz, re-  
11 subpoena T. Bennett and locate K Hodges and G. Elliott;

12 WHEREAS, Defendants are amenable to extend the discovery deadline;

13 WHEREFORE, the parties stipulate and agree to extend the discovery deadline by 45 days  
14 to March 28, 2022.

15 IT IS SO STIPULATED.

16 Dated: February 3, 2022

17  
18 MORALES FIERRO & REEVES

GEORGE T. BOCHANIS, LTD.

19  
20 By: /s/ William C. Reeves  
William C. Reeves  
MORALES FIERRO & REEVES  
21 Attorneys for Plaintiff

By: /s/ George T. Bochanis  
George T. Bochanis  
GEORGE T. BOCHANIS, LTD.  
22 Attorneys for Defendants

23 The Court, having considered the Stipulation of the parties and good cause appearing, agrees  
24 to to extend the deadline to complete discovery to March 28, 2022.

25 IT IS SO ORDERED:

26 Dated: February 3, 2022

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28   
UNITED STATES MAGISTRATE JUDGE